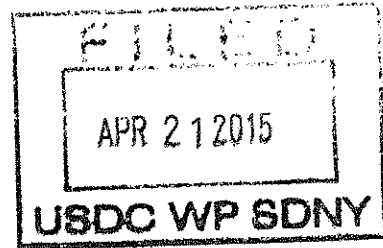


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



Daniel Barani

(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)

15 CV 3109  
Civ.

- against -

Federal Bureau of Investigation  
(FBI)

(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

JUDGE CAPRONI

**CIVIL ACTION COMPLAINT**

---

I, Daniel Barani, as Plaintiff hereby files this Complaint against the above named Defendants and avers as follows:

1. Plaintiff, Daniel Barani is an adult individual with the mailing address of 401 West 152<sup>nd</sup> Street, New York, NY 10031.
2. Defendant, Federal Bureau of Investigation (FBI) is an agency of the United States Department of Justice that serves as both a federal criminal investigative body and an internal intelligence agency with places of business at: 935 Pennsylvania Ave NW, Washington, DC 20535-0001; 26 Federal Plaza 23<sup>rd</sup> floor New York, NY 10278-0004; William J. Green, Jr. Building 600 Arch Street 8<sup>th</sup> floor Philadelphia, PA 19106; One Center Plaza, Suite 600 Boston, MA 02108; Claremont Tower 11 Centre Place Newark, NJ 07102

Count I  
Plaintiff v. Defendants  
Negligence and Deliberate Indifference

3. Plaintiff hereby incorporates by reference the preceding paragraphs of this Complaint as if same were set forth herein at length
4. All the acts of the defendants alleged herein to have been done or not have been done by the defendants, all employees, all other hired agents from DHS, DOD, CIA, FBI and the private contractors associated with these agencies; acting within the course and scope of their employment for and on behalf of the said defendants.
5. In 2006, plaintiff met the following hired undercover agents in person, Joseph

Tremania, John Fiore, Rick Borgia, Craig Zucherro, Jason Dunn, Michael Franzoni, Bob Jameson, and James Lee.

6. A number of the defendant's employees are associated with the CIA, FBI, DHS and DOD who have harassed plaintiff for the past eleven years for no apparent reason.
7. As a whole organization the defendants were in violation of the plaintiff's constitutional rights in the following ways;
  - (a) The defendants falsely profiled plaintiff as a terrorist;
  - (b) The defendants, specifically John Fiore and Joseph Tremania, Rick Borgia. Jason Dunn chose plaintiff for mind control drug experiments without his consent;
  - (c) The defendants, specifically Jason Dunn, implanted a microchip in plaintiff's arm without his consent;
  - (d) The defendants, specifically John Fiore, Joseph Tremania, James Lee and Rick Borgia are watching plaintiff 24/7 through electronic surveillance in order to monitor his reactions to their various mind manipulations;
  - (e) The defendants have mentally, physically and psychologically abused and harassed plaintiff for eleven years;
  - (f) The defendants continue to use the Internet as a way to harass and intimidate plaintiff as well as regulate his contact with the outside world;
  - (g) The defendants completely destroyed plaintiff's business and therefore have intentionally ensured that plaintiff will be dependent on others for employment;

COUNT III

Plaintiff v. Defendants

Mind Control Experiments and Violation of expectation of Privacy

9. Defendants chose to use plaintiff for a long-term mind control experiment intended for profiled terrorists due to the post 9/11 hysteria in the United States.
10. Defendants hired employees to continue these mind control experiments by secretly invading plaintiff's zones of privacy in public establishments since 2006 to this day.
11. The defendants have illegally continued to use plaintiff for the benefit of their research for the US Government for eleven years and have ignored how such act would ruin plaintiff's life in the following ways:
  - (n) The defendants failed to make a proper finding in regards to plaintiff's lifestyle as a terrorist or not;
  - (o) The defendants failed to respect plaintiff as a human being with privacy rights;
  - (p) The defendants failed to stop the experiments on plaintiff as a part of their duty under the "Equal protection law;"
12. Defendants hired high technicians to continue to monitor plaintiff's reactions through electronic surveillance, while being secretly drugged and manipulated.
13. The defendants on different occasions tried more than one drug on plaintiff, such as the day before Labor Day in September 2008, when plaintiff experienced severe symptoms from one of their drug trials such as dizziness, depression, visual and audio hallucinations, numbness with pain on the left

side of his body, insomnia and suicidal thought.

14. Defendants have disregarded the dire consequences of heavily drugging plaintiff on November 25, 2008, which resulted in plaintiff falling critically ill for nine months and was unable to function normally.

COUNT IV  
Plaintiff v. Defendants  
Implanting a Microchip and Violation of privacy rights

15. Defendants hired Jason Dunn to implant a microchip inside plaintiff's arm without his consent during fall of 2009.
16. Defendants used this implanted microchip to track plaintiff's movement 24/7.
17. Defendants occasionally activate this implanted microchip in plaintiff's arm to burn and cause him physical and mental pain.
18. Defendants use this implanted microchip in combination with the illegal drugs to cause plaintiff to feel depressed and suicidal.
19. Defendants use this implanted microchip to control plaintiff's mind, thus instigating him to attempt suicide.
20. By using this type of monitoring over plaintiff, the defendants have displayed the following:
- (q) An extreme form of intruding into plaintiff's zones of privacy;
  - (r) An obvious disregard and violation of plaintiff's 4<sup>th</sup> amendment rights;
  - (s) A violation of plaintiff's right to privacy;
  - (t) A violation of a "clearly established right" of which a reasonable official should know, rather than illegally using plaintiff for their sole purpose.

COUNT V  
Plaintiff v. Defendants  
24/7 Surveillance and violation of 4<sup>th</sup> & 5<sup>th</sup> Amendments

21. Defendants have hired agents to follow plaintiff around physically 24/7 for the past eleven years including when he traveled to Seattle in July 2010 and March 2011 up to this day.

22. Defendants have hired technicians to monitor plaintiff's communications 24/7 through wire tapping of his phones in violation of his 4<sup>th</sup> amendment right.

23. Defendants have hired technicians to monitor plaintiff's reactions to the mind control drugs and his daily activities through watching him through electronic surveillance.

24. Defendants technicians use surveillance cameras to monitor plaintiff 24/7

25. The defendants are tracking plaintiff as a profiled terrorist, rather than one who has been wrongfully accused and been used unwillingly for experiments, as such exemplifying a clear reason why plaintiff should not be trailed:

(u) The defendants have no just or probable cause to trail the plaintiff;

(v) The defendants are violating plaintiff's zones of privacy for the sole benefit of the US Government's experiments.

COUNT VI  
Plaintiff v. Defendants  
Abuse and Non-observance of "Fair Warning Standard"

26. Defendants have capriciously abused and tortured plaintiff for the past eleven years.

27. Defendants and their hired agents cause mental abuse and torture to plaintiff by keeping 24hrs surveillance on him.

28. Defendants also cause emotional abuse by using the various surveillance techniques as mentioned above on plaintiff daily, limiting his social interactions.

29. Defendants and their hired agents cause physical abuse by not protecting plaintiff but instead harming plaintiff and destroying his career.

30. Defendants and their hired agents cause psychological abuse by drugging plaintiff at their own will.

31. Defendants and their hired agents have also caused psychological abuse by continuing to monitor his reactions through the above mentioned intrusive surveillance techniques.

32. Defendants and their hired agents have caused physical torture and abuse to plaintiff as witnessed by the incident at Havana Inc. establishment. (as mentioned in Count VIII Assault).

33. The defendants have maltreated the plaintiff in the following ways:

(w) Failure to protect plaintiff from harm as part of his equal protection right;

(x) Failure to restrict their agents from violating the plaintiff's privacy rights;

(y) Failure to properly supervise their agents in observing the fair warning standard;

(z) Failure to properly oversee their agent's investigations in violating a clearly established right;

(A) In failing, the DOD, DHS, CIA and FBI, are responsible for the tortious acts of its agents under the respondeat superior theory.

34. Defendants have continued to abuse plaintiff regardless of the previous complaint by plaintiff on November 25, 2010, where plaintiff filed and listed all

the damages for his tortious claim.

35. Defendant has knowingly caused plaintiff irreparable amounts of pain and suffering to solely benefit the US Government's unethical and inhuman secret experiment.

COUNT VII  
Plaintiff v. Defendants  
Cyber Stalking and Violation of 4<sup>th</sup> Amendment

36. The defendants hire technicians to use the Internet as a way to monitor plaintiff's correspondences through electronic surveillance.

37. These technicians continue to make mockery of plaintiff on (My Space, Facebook and Google website) while admitting fully that they are aware that the plaintiff was being experimentally drugged.

38. These technicians also deliberately block certain outgoing email messages from plaintiff that contain information about the defendants in order to ensure that they remain protected from public view.

39. These technicians use the Internet to control plaintiff's Internet experience such as which information is seen or not.

40. These technicians use disguised accounts to display negative messages to plaintiff on My Space, Facebook and Google website accounts.

COUNT VIII  
Plaintiff v. Defendants  
Physical Assault and Deliberate indifference

41. Defendants lured plaintiff to Havana Inc. establishment on April 27, 2008 to have him severely assaulted (knocking out all his teeth) by their colleagues, while they deliberately watched and abandoned him lying unconscious in a pool of



blood.

42. The defendants attacked plaintiff rather than protect him in the following ways:

(B) Failure to assist the plaintiff while lying unconscious in a pool of blood;

(C) Failure to take plaintiff to nearest hospital seeing his condition;

(D) Failure to observe the rights, safety and position of the plaintiff at the place aforesaid;

(E) Failure to accord the plaintiff his equal protection right under the law;

43. Defendant's hired their agents at Havana Inc. to first drug plaintiff's drink to put him in an unconscious state and subsequently assaulted him.

44. As a result of this incident, the defendant's hired agents knocked out more than seven sets of teeth from plaintiff's mouth, violently bruised his right shoulder, with his knees and ribs.

45. As a result of this incident, the defendant's hired agents caused plaintiff to suffer from a deep large cut on his forehead and a loss of consciousness.

46. As a result of this incident, the defendant's hired agents caused plaintiff's back and neck to be injured, together with a severe shock to his nerves and nervous system, all of which plaintiff has been advised by his physician that they will be permanent in nature.

47. As a result of the aforesaid incident, plaintiff has undergone great physical pain, mental anguish and a surgical procedure, thus will continue to endure same for an indefinite period of time to his great detriment and loss.

48. As a result of the aforesaid incidents, plaintiff has been unable to attend to his

daily duties and occupation, and thus will be unable to attend to the same for an indefinite period of time to his great detriment and loss.

49. As a direct consequence of defendant's negligence, carelessness, and recklessness, plaintiff suffered damages as more fully described above and below.

COUNT IX  
Plaintiff v. Defendants  
Deliberate Interference in Business

50. Defendants intentionally destroyed plaintiff's business and livelihood, leaving him homeless and penniless.

51. Defendants used endless legal manipulations to end plaintiff's business.

52. Defendants used their secret and illegal experimental drugs to cause plaintiff to be unable to handle the stress of managing his business and submitting all the required petitions and motions to the Bucks County Court.

COUNT X  
Plaintiff v. Defendants  
Mental Trauma

53. Defendants and their hired agents have used their position in power to mentally torture plaintiff by hiring a number of seductive women to lace his drinks with drugs secretly in public establishments over repeated instances throughout the past eleven years.

54. Defendants and their hired agents have caused plaintiff a near death experience when they physically traumatized him on April 27, 2008.

55. Defendants and their hired agents use different types of induced symptomatic drugs on plaintiff that included but not limited to dizziness, insomnia, numbness

and extreme depression with suicidal ideation until this day.

56. Defendants and their hired agents also heavily drugged plaintiff on November 25, 2008 and as a result plaintiff was terminally ill for ten months.

57. The defendants and their hired agents in Buck County Court with other correction officers experimented different dangerous drugs on plaintiff while he was incarcerated, resulting in suicidal ideation.

58. As a result of these incidents, as well as numerous other times of severe torturous conditions, plaintiff have developed cancer and now suffers a severe fear of dying at the hands of defendants or their hired agents.

59. Defendants and their agents used plaintiff for their experiment, which has altered his personality.

60. The defendants and their agents continue to traumatize plaintiff in the following ways:

- (F) The defendants have not stopped using secret means to drug plaintiff;
- (G) The defendants have not stopped their 24hr surveillance on the plaintiff;
- (H) The defendants have not stopped manipulating the microchip in plaintiff's arm to cause extreme stress and suicidal ideation;
- (I) The defendants refused to grant equal protection to plaintiff as deemed by law;
- (J) The defendants continue to falsely profile plaintiff as a terrorist;
- (K) The defendants refused to remove the illegal microchip implanted in plaintiff's arm;

COUNT XII  
Plaintiff v. Defendants  
Abusive use of Government Power

69. The defendants used their positions of power under color of state to use plaintiff for their experimental purpose.

70. The defendants have continued to use their power and authority to cause immense pain and extreme suffering to the plaintiff with no repercussions.

71. The defendants used their badge of authority to continue to abuse the plaintiff by hiring agents to carry out their own agenda as well as continue their secret operation.

72. The defendants have orchestrated an entire staff, a long-term mind control experiment and deliberately interfering with plaintiff's life even to this day.

73. The defendants under deliberate indifference used plaintiff for their illegal secret experiments without regards to the consequence of their acts.

74. The defendants used their position of power to deliberately destroy plaintiff's health with experimental drugs and by causing excessive trauma through constant surveillance and physical beating.

75. The defendant's main person of control, John Fiore has continued to mastermind all these secret operations in an attempt to slowly terminate plaintiff's life.

76. The DOD has displayed conflicting roles as a department that protects US citizens from harm against terrorists within and from outside the country; and at the same time deliberately and excessively harming innocent immigrants in order to keep up an illegal and unethical human experiment.